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12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT
15
16 EASTERN DISTRICT OF CALIFORNIA

17
18 UNITED STATES OF AMERICA,
19 Plaintiff,
20 v.
21 KRISTOPHER THOMAS,
22 CHARMANE DOZIER,
23 KETTISHA THOMPSON-DOZIER, and
24 SHARON VANCE
25 Defendants.

CASE NO. 5:24-MJ-00007-CDB
STIPULATION TO CONTINUE PRELIMINARY
HEARING AND EXCLUDE TIME

18 The parties stipulate as follows:

19 1. The complaint was issued in this case on February 14, 2024, and the defendants
20 subsequently made their initial appearances. The preliminary hearing was scheduled for May 23, 2024,
21 with an appropriate time exclusion so that defense counsel could review discovery and consider pre-
22 indictment resolutions of the case.

23 2. The government has produced initial discovery to defense counsel. The discovery is over
24 one million pages, and it includes detailed financial records, text messages, emails, and other
25 correspondence, and interview reports.

26 3. The parties now agree to further continue the preliminary hearing until July 18, 2024.

27 4. The parties agree that good cause exists for the continuance because the extension is
28 required to allow defense counsel reasonable time to complete their review of the discovery, prepare for

1 any litigation, and fully consider a pre-indictment resolution of the case.

2 5. The parties agree that the interests of justice served by granting this continuance
3 outweigh the best interests of the public and the defendants in a speedy trial. The parties also agree that
4 the period from May 23, 2024, through July 18, 2024, should be excluded. Fed. R. Crim. P. 5.1(d); 18
5 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

6 IT IS SO STIPULATED.

7 Dated: May 3, 2024

PHILLIP A. TALBERT
United States Attorney

9 */s/ Joseph Barton*

10 Joseph Barton
11 Assistant United States Attorney

12 Dated: May 3, 2024

13 */s/ Peter Jones*

14 Peter Jones
15 Counsel for Kristopher Thomas

16 Dated: May 3, 2024

17 */s/ Christina Corcoran*

18 Christina Corcoran
19 Counsel for Charmane Dozier

20 Dated: May 3, 2024

21 */s/ Serita Rios*

22 Serita Rios
23 Counsel for Kettisha Thompson-Dozier

24 Dated: May 3, 2024

25 */s/ Victor Nasser*

26 Victor Nasser
27 Counsel for Sharon Vance

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9 IN THE UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

CASE NO. 5:24-MJ-00007-CDB

13 PROPOSED ORDER

14 v.

15 KRISTOPHER THOMAS,
CHARMANE DOZIER,
KETTISHA THOMPSON-DOZIER, and
16 SHARON VANCE

17 Defendants.

18

19 The Court has read and considered the parties' stipulation to further continue the preliminary
20 hearing in this case and exclude time. The Court finds there is good cause for the continuance so as to
21 allow defense counsel reasonable time to complete their review of the discovery, prepare for any
22 litigation, and fully consider a pre-indictment resolution of the case. The Court also finds that the
23 interests of justice served by granting the continuance outweigh the interests of the public and the
24 defendants in a speedy trial. Therefore, for good cause shown:

25 1. The preliminary hearing is continued from May 23, 2024, until July 18, 2024, at 2:00
26 p.m., and the defendants shall appear then before the Fresno duty magistrate judge; and

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2. The period from May 23, 2024, through July 18, 2024, shall be excluded pursuant to Federal Rule of Criminal Procedure 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) for the reasons set forth in the parties' stipulation.
3. **No further stipulated requests for a continuance of the preliminary hearing will be entertained in this action without convening for an in-person hearing to consider the parties' request and showing of good cause.**

IT IS SO ORDERED.

Dated: **May 3, 2024**



UNITED STATES MAGISTRATE JUDGE